

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Civil Action No.: 004-105150JLT

<hr/> PAN AMERICAN AIRWAYS CORP.,)
Plaintiff/Counterclaim Defendant,)
vs.)
)
ROBERT E. BARNES,)
Defendant/Counterclaim Plaintiff.)

JOINT MOTION TO EXTEND DEADLINE IN COURT'S 9/13/06 ORDER

NOW come the parties in the above entitled matter and respectfully request this Honorable Court extend the September 14, 2006 noontime deadline to Friday, September 15, 2006 at 11:00 a.m. for the following reasons:

1. On September 12, 2006, the parties appeared for the Final Pretrial Conference. At that conference, Judge Tauro inquired about the possibility of settlement.
2. Immediately following the hearing, counsel for the parties discussed settlement in depth and detail in the hallway.
3. As a consequence of that discussion, counsel for the parties agreed to continue to explore the potential for a settlement with their respective clients.
4. On Wednesday, September 13, 2006, Judge Tauro issued an Order directing the parties, inter alia, to submit certain items to the Court before noontime on September 14, 2006.
5. The parties spent considerable time exploring the potential of a settlement into the late evening hours of September 13, 2006 and as a consequence, respectfully request an extension of the noontime deadline in paragraphs 1, 2 and 6 in the 9/13/06 Order to 11:00 a.m. on 9/15/06 so that settlement discussions can continue in earnest.
6. Allowance of this Joint Motion will enable the parties to continue to explore settlement and not incur additional costs as well as comply with the Court's Order, if necessary.

The Plaintiff/Counterclaim Defendant,
Plaintiff
By its attorney,

/s/ John J. O'Brien, Jr.
John J. O'Brien, Jr.
BBO# 375885
O'Brien & von Rosenvinge, P. C.
27 Mica Lane, Suite 202
Wellesley, MA 02481
(781) 239-9988

DATED: September 13, 2006
JointMtnExtendDeadline

The Defendant/Counterclaim
By his attorney,

/s/ Peter Piel, Esq.
Peter Piel, Esq.
BBO# 639070
Law Office of Peter Piel
800 Turnpike St., Suite 300
North Andover, MA 01845
(978) 794-7755